

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FRANCISCO JAVIER CASABLANCA-TORRES,

Plaintiff,

-against-

THE CITY OF NEW YORK; MAYOR BILL DE BLASIO;
NEW YORK CITY POLICE DEPARTMENT (“NYPD”)
COMMISSIONER DERMOT SHEA; NYPD CHIEF OF
DEPARTMENT TERENCE MONAHAN; NYPD
OFFICER RYAN COSTELLO, SHIELD NO. 03464; and
NYPD MEMBERS JOHN and JANE DOES #1-4,

Defendants.

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**DECLARATION OF ANDREA
OSGOOD IN SUPPORT OF
DEFENDANTS’ MOTION TO
DISMISS PURSUANT TO FED.
R. CIV. P. 12(B)(6)**

21 Civ. 10832 (LAK)

ANDREA OSGOOD, an attorney duly admitted to practice in the State of New York and in this Court, declares, pursuant to 28 U.S.C. §1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants the City of New York, Bill de Blasio, Dermot Shea, Terence Monahan, and Ryan Costello. As such, I am familiar with the facts stated below. I submit this declaration in support of Defendants’ Motion to Dismiss the First Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

2. Annexed hereto is Exhibit “A,” a true and correct copy of plaintiff’s First Amended Complaint, filed in this action on April 1, 2022.

Dated: New York, New York
June 13, 2022

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
*Attorney for Defendants City of New York, de
Blasio, Shea, Monahan, and Costello*
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By: /s/ *Andrea Osgood*
Andrea Osgood
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY ECF**
All counsel of record